

**Hardwood Products Company LLC
Piscataquis County
Guilford, Maine
A-328-71-J-M (SM)**

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Hardwood Products Company LLC (HPC) located in Guilford, Maine was issued Air Emission License A-328-71-I-R on April 24, 2006 permitting the operation of emission sources associated with their wood milling facility.
2. HPC has requested a minor revision to their license in order to correct the maximum heat input of one of their boilers.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

<u>Equipment</u>	<u>Maximum Capacity (MMBtu/hr)</u>	<u>Maximum Firing Rate (gal/hr)</u>	<u>Fuel Type, % sulfur</u>	<u>Stack #</u>
Boiler #3	2.8	19.8	#2 fuel oil, 0.5%	2

C. Application Classification

This amendment will increase emissions by less than 4 ton/year for each single pollutant and less than 8 ton/year for all pollutants combined. Therefore, this modification is determined to be a minor revision and has been processed as such.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in Chapter 100 of the Department's regulations. Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Boiler #3

Due to typographical errors in the last renewal and using the boiler rating instead of the maximum burner rating, the maximum heat input was listed incorrectly for Boiler #3. The maximum firing rate for the burner associated with Boiler #3 is 19.8 gph. Therefore, HPC has requested that the maximum heat input for Boiler #3 be corrected to 2.8 MMBtu/hr.

A summary of the BPT analysis for Boiler #3 is the following:

1. The total fuel use for Boiler #3 shall not exceed 100,000 gal/year of #2 fuel oil based on a 12 month rolling total.
2. The SO₂ emission limits are based on the firing of fuel which meets the criteria in ASTM D396 for #2 fuel oil.
3. The PM and PM₁₀ limits are derived from Chapter 103.
4. NO_x emission limits are based on data from similar #2 fired boilers of this size and age.
5. CO and VOC emission limits are based upon AP-42 data dated 9/98.
6. Visible emissions from the boilers shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

G. Annual Emissions

HPC shall be restricted to the following annual emissions, based on a 12 month rolling total:

Total Licensed Annual Emission for the Facility
Tons/year
(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Boilers #1 & #2	35.8	35.8	1.6	31.9	39.1	1.1
Boiler #3	0.8	0.8	3.5	2.1	0.3	0.1
Total TPY	36.6	36.6	5.1	34.0	39.4	1.2

ORDER

The Department hereby grants Air Emission License Minor Revision A-328-71-J-M subject to the conditions found in Air Emission License A-328-71-I-R and in addition to the following conditions.

The following shall replace Condition (17) of air emission license A-328-71-I-R:

(17) Boiler #3

- A. Total fuel use for Boiler #3 shall not exceed 100,000 gal/yr of #2 fuel oil. Compliance shall be demonstrated by fuel records from the supplier showing the quantity and type of fuel delivered. Records of annual fuel use shall be kept on a 12- month rolling total basis. [06-096 CMR 115, BPT]
- B. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Emission Unit	PM (lb/hr)	PM ₁₀ (lb/hr)	SO ₂ (lb/hr)	NO _x (lb/hr)	CO (lb/hr)	VOC (lb/hr)
Boiler #3	0.33	0.33	1.39	0.83	0.10	0.01

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A-328-71-J-M**

4

**Departmental
Findings of Fact and Order
Air Emission License
Amendment #1**

- C. Visible emissions from Boiler #3 shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101(2)(B)(1)(b)]

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2007.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAVID P. LITTELL, COMMISSIONER

The term of this amendment shall be concurrent with the term of Air Emission License A-328-71-I-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 5/3/07

Date of application acceptance: 5/4/07

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.